

American Automobile Association

FREQUENCY COORDINATION
AUTO EMERGENCY (LA)1000 AAA Drive
Heathrow, FL 32746-5063
TEL: 407/444-7786
FAX: 407/444-7380

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

April 24, 1995

Kathryn Hosford, Assistant for Land Mobile Services
Private Radio Division
Wireless Telecommunications Bureau
Federal Communications Commission
2025 M Street, NW
Room 5002
Washington, DC 20554

Re: PR Docket No. 92-235
Ex Parte Presentation

Dear Ms. Hosford:

The American Automobile Association ("AAA") has participated extensively in PR Docket No. 92-235 and submits this letter to reiterate its views on the matter of the Commission's proposed consolidation of the radio services. Based on the important public safety issues presented herein, AAA respectfully urges that the Commission (1) adopt a consolidation plan that retains separate radio services for public safety entities like AAA, and (2) retain AAA's role as frequency coordinator of its emergency services. While the Commission's attention has rightfully been focused on the thorny issue of narrowbanding, the above issues should not be overlooked as the Commission adopts its refarming plan.

AAA, the largest membership organization in the United States (with 33,029,258 members), offers not only convenience and ancillary benefits such as travel agency services, but, more importantly, prompt rescue service to stranded motorists. Persons who make calls to AAA range from stranded motorists alone at night in uncomfortable situations to motorists caught in severe snow storms or other dangerous weather situations. As such, AAA provides critical public safety services. AAA service moreover saves thousands of hours consumed by the urban traffic jams that stalled cars create. In major disasters such as earthquakes, ice storms, and hurricanes, AAA trucks and dispatchers complement and reinforce the strained resources of state and local fire and police departments, and provide invaluable public safety services to AAA members and non-members alike.

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Several AAA practices further enhance the value of AAA's radio services and their ability to provide rescue services. For one, AAA uses a hierarchical system by which it assigns first priority to incoming calls where danger to a motorist's life or property is involved. AAA additionally uses a continuous contact system whereby it maintains contact with the tow truck after dispatch, monitoring service time and quality and responding to dangerous and changing situations quickly, by calling in police, fire, rescue or passenger transport as necessary. Using this system, AAA dispatchers and drivers can communicate altered routes or plans as changing situations demand, "upgrade" a call to first priority, and re-route a truck as new information becomes available. Using its mobile radio operations in this manner helps ensure prompt, accurate, and flexible rescue services which AAA provides even to non-AAA members who find themselves in situations threatening their life or property.

To maintain this level of emergency service to the public, AAA must be permitted to continue operating in a radio service pool that is either reserved exclusively for automobile emergency operations or that is reserved for private or public safety operations in general. While AAA applauds the Commission's efforts to improve the efficient use of radio spectrum by consolidating certain radio services, AAA submits that the motoring public simply cannot afford for AAA to be placed in a service pool with non-emergency services which could interfere with AAA's critical rescue services.

Without a pooling arrangement which provides continued protection to public safety entities, AAA would find itself unable to provide the disaster relief and individual rescue services which it has so effectively provided in the past, thereby creating a void that would further strain police and fire departments, or result in a net loss of service. Even more importantly, a pooling arrangement which fails to afford AAA an environment free of interference from non-emergency operations would jeopardize the safety of life and property.

AAA therefore urges the Commission to either preserve the Automobile Emergency Radio Service in which AAA is currently located, or to place AAA in a public safety or other pool which would provide AAA with the level of protection afforded other government safety entities. More specifically, AAA respectfully requests that the Commission either (1) preserve the Automobile Emergency Radio Service, (2) place AAA in a new radio service which would be reserved exclusively for private public safety services (i.e., an Industrial Safety Pool), or (3) place AAA in the government public safety radio service. Any of the above alternatives would help ensure that non-emergency calls would not interfere with AAA's rescue operations and that AAA would be given priority similar to that afforded government safety entities.

In addition, AAA requests that the Commission permit AAA to retain coordination responsibilities for its frequencies. In its role as frequency coordinator, AAA has been able to help its member auto clubs coordinate their efforts to form the efficient nationwide automobile emergency network that exists today. AAA has also been able to ensure that frequency coordination requests of a sensitive, safety-related nature receive priority attention. It is vital that AAA be able to continue in this role.

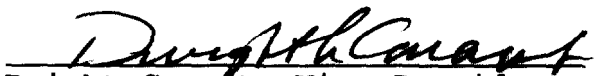
AAA is aware of the suggestions of certain organizations, such as ITA, CICS, and TELFAC, that the frequency coordination function be consolidated in the name of simplicity or uniformity. However, an outside coordinator, unfamiliar with the peculiarities of automobile emergency services, would be unable to effectively coordinate AAA frequencies, thereby endangering the motoring public. A mass-production, assembly line approach may have worked in the private carrier paging realm, where numerous frequencies have been allocated for relatively fungible services. However, the Commission has allocated but a few channels to the Automobile Emergency Radio Service, and it made such allocation in recognition of the fact that this service provides a vital safety link for stranded motorists. This overriding public safety goal must be given priority, pursuant to Section 1 of the Communications Act of 1934, as amended. The recent spate of interservice coordination requests AAA has received from other coordinators for less urgent radio needs only tends to confirm that a consolidated coordinator may be willing to exhaust the automobile emergency spectrum for non-priority operations.

In sum, AAA urges that the Commission focus on the safety-related concerns inherent in its consolidation proposal, so that the public can continue to receive the prompt and effective emergency service that AAA currently provides.

Sincerely,

AMERICAN AUTOMOBILE ASSOCIATION

By:


Dwight Conant, Vice President
Motoring Services and Divisions

cc: Regina Keeney, Chief, Wireless Telecommunications Bureau
Ralph A. Haller, Deputy Chief, Wireless Telecommunications Bureau
Gerald P. Vaughan, Deputy Chief, Wireless Telecommunications Bureau
Honorable Reed E. Hundt, Chairman
Honorable Andrew C. Barrett
Honorable Susan Ness
Honorable James H. Quello
Honorable Rachelle Chong